



VIA Email: comments-northern-idpanhandle-bonnerrsferry@usda.gov

January 13, 2020

Bonnerrsferry Ranger District
Attn: Jennifer Anderson
6286 Main Street
Bonnerrsferry, Idaho 83805

Dear Jennifer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Westside Restoration Project.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Idaho Panhandle National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The Westside Restoration project area is approximately 60,000 acres in size and is located within Boundary County, Idaho encompassing the Myrtle, Snow and Caribou Creek watersheds and Dodge Peak and White Mountain areas. Activities would occur on federal lands; most administered by the Bonnerrsferry Ranger District with a lesser amount (212 acres) administered by the Coeur d'Alene Field Office of the BLM. This project is being developed in collaboration with the Kootenai Valley Resource Initiative to complement other landscape restoration work in the Lower Kootenai River Valley CFLRP.

As pointed out in the scoping document much of the landscape is composed of mature forest structure. However, long-lived seral species, in particular western white pine, ponderosa pine, and western larch, have been replaced by Douglas-fir, grand fir, western hemlock, lodgepole pine, and subalpine fir. This type of homogeneous forest composition and structure can be a set up for severe, large fire and insect disturbance events.

The Project Objectives and Management Needs include:

1. *Fuels Reduction*

Approximately 75% of the project area occurs in the county-defined Wildland Urban Interface (WUI), including all of the Myrtle Creek watershed, which is the current source of drinking water for the City of Bonners Ferry. In many instances, large quantities of forest fuels on public lands occur next to homes and private property, and hazardous fuels also occur immediately adjacent to National Forest System roads that are important for serving as emergency egress routes for evacuating people from the area and ingress for firefighter personnel and equipment when wildfires occur. These conditions exacerbate the need for immediate treatments. The majority of the Westside Restoration project landscape is dominated by moist forest types that evolved with high and mixed severity fires. Thus, the need to treat these stands is urgent. Silvicultural and fuels treatments are permitted in this area since approximately 62 percent of the National Forest System lands in the Westside project area occur within a Forest Plan designation called General Forest.

2. *Improving Forest Landscape Resiliency*

There is a need to reduce acreages of dense stands of similar sized and aged Douglas-fir, grand fir, lodgepole pine and subalpine fir which are currently very susceptible to insects (such as bark beetle), root diseases, and large wildfires. In their place the preferred species of white pine, ponderosa pine and western larch can be replanted thus providing for resistance to disturbance and allowing stands to trend towards desired older forest structure. Additionally, creating patches of variable sized openings could further increase landscape resiliency through structural diversity.

3. *Other Resource Objectives To Improve*

- a. Improve both motorized and non-motorized recreation experiences
- b. Improve forage for grizzly bears and mule deer
- c. Improve the scenic quality of the project area
- d. Decrease sediment sources to maintain or improve water quality and aquatic habitat
- e. Controlling noxious weeds
- f. Determine long-term transportation needs
- g. Benefit the local economy

First, I would like to say that AFRC strongly supports this project moving forward. I would also like to offer the following comments and suggestions that I believe could improve and strengthen the Draft EA document that you will later be preparing.

1. AFRC members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present day needs but also important for needs in the future. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments effect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times regarding the long-

term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. While the treatments on the Westside Restoration project will help to address this long-term sustainability concern, they will likely provide short-term products for the local industry and we want to ensure that this provision is an important consideration for the decision maker as the project progresses. As we will discuss later in this letter the importance of our members' ability to harvest and remove these timber products from the timber sales generated off this project is paramount. We would like the Forest Service to recognize this importance by **adding economic viability & support to the local infrastructure to the purpose and need** of the Westside Restoration project. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service lands. As the Forest Service surely knows, the "restoration" treatments that are desired on these public lands cannot be implemented without a healthy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed.

2. AFRC always encourages the Forest Service to treat as many acres as practical when preparing an EA or EIS. The expense of these planning documents are high and we feel it is important to get as much work done using this document. Treating more acres also adds to the timber volume that will be produced. The National Forests in Idaho are very important for providing the raw materials that sawmills within the State need to operate. The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Specifically, studies in Idaho have shown that 18 direct and indirect jobs are created for every one million board feet of timber harvested. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in.

Vegetation Management Treatment	Draft Proposed Action Acres
Commercial timber harvest	
Intermediate Harvest	7,276
Regeneration Harvest	2,256
Total commercial activities	9,532
Non-commercial vegetation management activities	
Precommercial thinning	1,490
Prescribed burning of natural fuels	2,439
Total non-commercial activities	3,929
Total acres of vegetation treatments	13,461

AFRC believes the Forest has done a good job of analyzing treatment opportunities as per the table listed above. A combination of both commercial and non-commercial activities

are needed to complete needed restoration. Of the total 9,532 acres to be commercially harvested, 9,320 acres will occur on National Forest lands and 212 acres on BLM land.

3. The viability of a timber sale is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Bonners Ferry market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Tethered-assist equipment is also becoming a more viable and available option for felling and yarding on steep slopes. This equipment has shown to contribute little additional ground disturbance when compared to traditional cable systems. Please prepare your NEPA analysis documents in a manner that will facilitate this type of equipment.

4. An intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The road decommissioning proposed in the Westside Restoration scoping notice likely represents a **permanent** removal of some roads and likely the deferral of management of those forest stands that they provide access to. The land base

covered in the Westside Project area are to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

We would like the District to carefully consider the following three factors when making a decision to decommission any road in the project area:

- Determination of any potential resource risk related to a road segment
- Determination of the access value provided by a road segment
- Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe the Forest has done an adequate job of assessing road needs. Our main comment in this section is when performing storage of current roads, AFRC prefers the use of blockades, gates, or boulders and expensive recontouring not be considered.

Road Management Type	Total Miles
Temporary Road Construction	19.4
Reconstruction	40.1
Maintenance	58.6
Storage of Currently Open Roads	16.3
Road Decommissioning	1.6

5. AFRC supports the Forest's plan to do restoration work in three Inventoried Roadless Areas. The commercial harvest and burning is necessary to address forest health and fuels buildup issues. (See table below). As noted, the work to be completed is in the General Forest land classification.

Roadless Area	Management Area	Harvest Acres	PCT	Burning Acres	Temporary Road Miles
Kootenai Peak IRA	General Forest	1,071	170	263	3.2
Selkirk IRA ¹	General Forest	188	13	38	0.8
	Backcountry	0	0	475	0
White Mountain IRA	Backcountry	0	0	682	0
TOTAL		1,259	183	1,458	4

6. One of the project objectives is to improve habitat for Grizzly Bear and Mule deer. Currently much of the land within the Westside project area consist of closed canopy stands, where forage for wildlife is limited. This structure shades the forest floor, limiting the growth of palatable shrubs and herbaceous species; this includes stands in all forest types including the higher elevation subalpine stands where mule deer forage. AFRC would support a Regional Office Amendment to generate openings during timber harvest over 40 acres to accomplish the establishment of needed forage for these species.

7. AFRC supports the need to expand the acres where hardwoods such as quaking aspen, paper birch, and cottonwood are significant components; these species play important ecological roles in our forests, such as providing for wildlife habitat. It may be necessary to remove the conifer overstory in these areas to accomplish this goal.
8. Much of the needed work to be done is in the WUI. AFRC recommends that areas adjacent to the WUI's be thinned heavily to reduce fuel loading and to increase residual tree growth and vigor. AFRC recommends thinning in these areas to 40 sq.ft of basal area per acre to get needed spacing.
9. Another project objective is to decrease sediment sources to maintain or improve water quality and aquatic habitat as well as improving forest health. AFRC believes that managing in the riparian areas can help to achieve these goals. It has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. The ACS describes the need for treatments that meet the need of multiple habitat types and we encourage the Bonners Ferry District to look for ways to incorporate treatments that meet those needs. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives that the ACS mandates should be considered.

The tradeoffs that the Forest Service will likely be considering through the ensuing environmental analysis will be between achieving these forest health benefits and potentially having adverse impacts to streams. These impacts to streams typically include stream temperature, wood recruitment, and sedimentation associated with active management. We would like the Forest Service to review the literature cited below and incorporate its findings into your environmental analysis that will shape the level of management permitted to occur in riparian reserves.

Stream temperature

Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management*, 270, 302-313.

Key points of the Janisch paper include:

- The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature.
- Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.

Anderson P.D., Larson D.J., Chan, S.S. 2007 Riparian Buffer and Density Management Influences on Microclimate of Young Headwater Forests of Western Oregon. *Forest Science*, 53(2):254-269.

Key points of the Anderson paper include:

- With no-harvest buffers of 15 meters (49 feet), maximum air temperature above stream centers was less than one-degree Celsius greater than for unthinned stands.

Riparian reserve gaps

Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old-growth versus early-mature riparian forests in western Oregon. *Aquatic Sciences* 75:547-558.

Key points of the Warren paper include:

- Canopy gaps were particularly important in creating variable light within and between reaches.
- Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests.

Wood Recruitment

Burton, Julia I., Olson, Deanna H., and Puettmann, Klaus J. 2016. Effects of riparian buffer width on wood loading in headwater streams after repeated forest thinning. *Forest Ecology and Management*. 372 (2016) 247-257.

Key points of the Burton paper include:

- Wood volume in early stages of decay was higher in stream reaches with a narrow 6-meter buffer than in stream reaches with larger 15- and 70-meter buffers and in unthinned reference units.
- 82% of sourced wood in early stages of decay originated from within 15 meters of streams.

Sedimentation

Rashin, E., C. Clishe, A. Loch and J. Bell. 2006. Effectiveness of timber harvest practices for controlling sediment related water quality impacts. *Journal of the American Water Resources Association*. Paper No. 01162

Key points of the Rashin paper include:

- Vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment.

Collectively, we believe that this literature suggests that there exists a declining rate of returns for “protective” measures such as no-cut buffers beyond 30-40 feet. Resource values such as thermal regulation and coarse wood recruitment begin to diminish in scale as no-cut buffers become much larger. We believe that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood

recruitment, based on this scientific literature. We urge the Forest Service to establish no-cut buffers along streams no larger than 40 feet and maximize forest health outcomes beyond this buffer.

10. We would like to encourage the Bonners Ferry District to consider several documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large- scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when compared to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. *Ecosphere* 7(1):e01224. 10.1002/ecs2.1224

In closing AFRC would like to thank the Bonners Ferry District for providing this in-depth scoping notice and information, and for doing a good job of analyzing the area and treatments needed. We look forward to working with you as the project moves toward the Draft EA and final implementation.

Sincerely,



Tom Partin
AFRC Consultant

